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April 7, 2022

**VIA ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007-1312

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**MEMORANDUM ENDORSED**

Re: United States v. Ivo Bechtiger, et al., 20 Cr. 497 (GHW)

Dear Judge Woods:

This firm represents Daniel Wälchli, a defendant in the above-captioned matter. We respectfully submit this letter to request a temporary modification of Mr. Wälchli's bail conditions to permit him to travel to Egypt on vacation from June 3, 2022 to June 13, 2022.

As your Honor may recall, Mr. Wälchli is a Swiss citizen who is charged in a one count indictment with having conspired to defraud the United States in violation of 18 U.S.C. § 371. Mr. Wälchli voluntarily agreed to come to the United States to contest the charges. On March 16, 2022, Magistrate Judge Robert W. Lehrburger released Mr. Wälchli on a previously agreed upon bail package that permits Mr. Wälchli to travel to any country in the world for work and to travel on personal matters within the European Union, the United Kingdom, and Switzerland.

Mr. Wälchli is requesting permission to travel to Egypt with his wife from June 3, 2022 to June 13, 2022. Mr. Wälchli and his wife had originally planned to take this vacation in 2019 as part of their 20<sup>th</sup> wedding anniversary celebration, but were forced to postpone the trip on several occasions, first for family reasons and then due to the COVID-19 pandemic. I have discussed this matter with the prosecutors, and they have informed me that the government takes no position with respect to this application.

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

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Thank you in advance for your consideration of this request.

Respectfully submitted,

/s/ Jeremy H. Temkin

Jeremy H. Temkin  
Richard F. Albert

cc: AUSA Olga Zverovich (by ECF)  
SAUSA Nanette Davis (by ECF)

Application granted. The defendant's bail conditions are modified as follows: the defendant may travel to Egypt from June 3, 2022 to June 13, 2022. The remaining conditions of his pretrial release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 30.

SO ORDERED.

Dated: April 14, 2022  
New York, New York

  
GREGORY H. WOODS  
United States District Judge